

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**STEPHEN GERAS** : **VIOLATIONS:**  
18 U.S.C. § 1951 (extortion - 1 count)

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Muhlenberg Township (hereafter, “the Township”), Berks County, Pennsylvania, was a governmental entity, the activities of which affect interstate commerce. The Township’s business was directed by an elected Board of Commissioners (“the Board”), comprised of five members.

2. Beginning in 1982, defendant STEPHEN GERAS was an elected Township Commissioner.

3. Each year, the Board appointed an attorney to act as Solicitor for the Township to provide legal services and legal advice to the Township. The Solicitor receives a yearly stipend, as well as compensation for additional services not covered by the annual salary. The billing for additional services provided by the Solicitor require approval by the majority of the Board for payment.

4. Beginning in 1982, the Board selected E. L., charged in a separate information, to serve as Solicitor to the Township.

5. In or about 1995, defendant STEPHEN GERAS instructed the Solicitor to pay GERAS one-third of the money the Solicitor received from the Township for additional services in order for the Solicitor to obtain approval for payment for the additional work.

6. Between in or about July 2000 and in or about May 2005, the Solicitor billed for and received approximately \$75,000 for additional legal services provided. In turn, the Solicitor paid approximately \$25,000 to defendant STEPHEN GERAS in order to obtain approval of the Township for payment of his bills.

7. From in or around July 2000 to on or about May 4, 2005. in Reading, Berks County, in the Eastern District of Pennsylvania, defendant

**STEPHAN GERAS**

did knowingly and unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce by extortion, in that defendant STEPHAN GERAS obtained and attempted to obtain property and things of value from the Muhlenberg Township Solicitor which were not due STEPHAN GERAS and his office, that is, a percentage of legal fees paid to the Solicitor by the Township, with the consent of the Solicitor having been induced: (1) by the

wrongful use of actual and threatened fear of economic harm; and (2) under color of official right.

In violation of Title 18, United States Code, Section 1951.

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**PATRICK L. MEEHAN**  
**United States Attorney**